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 GOPRO, INC.

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

GOPRO, INC., a Delaware corporation,

 Plaintiff,

 v.

 360HEROS, INC., a Delaware corporation,

 Defendant.

Case No. 16-cv-1944 (SI)

**PLAINTIFF GOPRO INC.'S
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL**

Date: October 27, 2017
 Time: 9:00 a.m.
 Ctrm.: 1, 17th Floor
 Hon. Susan Illston

Pursuant to Civil Local Rules 7-11(a), 79-5(d), and 79-5(e), and the Court's Standing Order, Plaintiff GoPro, Inc., ("Plaintiff" or "GoPro") respectfully moves the Court for administrative relief to file under seal documents designated confidential or highly confidential by Defendant 360Heros, Inc. ("Defendant" or "360Heros") (collectively, "the Requested Sealed Documents").

GoPro's Motion to Compel includes documents that 360Heros has designated as containing Confidential or Highly Confidential—Attorneys' Eyes Only information. Under the Protective Order entered by this Court on June 26, 2017 (Dkt. 73, "the Protective Order"), GoPro is required to file these documents under seal. For these materials, GoPro relies on 360Heros' designations to support its Administrative Motion to File Documents Under Seal.

The documents 360Heros has designated as confidential or highly confidential may be identified as follows:

Document	Portions Sought to be Sealed
Exhibit R to the Declaration of Byron R. Chin in Support of GoPro's Motion to Compel ("Chin Decl.")	Entire document
Exhibit T to Chin Decl.	Entire document
Exhibit U to Chin Decl.	Entire document

In addition, in an abundance of caution, GoPro seeks to seal the following documents that reference materials that 360Heros has designated as confidential or highly confidential. GoPro's request is narrowly tailored to seal only portions of these documents that reference 360Heros' confidential material:

Document	Portions Sought to be Sealed
Plaintiff GoPro, Inc.'s Notice of Motion and Motion to Compel	Portions of document appearing on pages 1, 9, 10, 12, 13, and 15 through 20
Exhibit N to Chin Decl.	Portions of document appearing on pages 2 through 4
Exhibit O to Chin Decl.	Portions of document appearing on pages 5 through 7

Document	Portions Sought to be Sealed
Exhibit P to Chin Decl.	Portions of document appearing on pages 4 and 5

This Motion is supported by the Declaration of Byron R. Chin and a [Proposed] Order. Pursuant to Civil Local Rules 79-5(d) and 79-5(e), GoPro lodges the Requested Sealed Documents with this Court, and respectfully requests leave to file these documents under seal.

A Proposed Order is being filed concurrently with this motion for the Court's convenience.

DATED: September 13, 2017

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON LLP

By /s/ Mehrnaz Boroumand Smith
MEHRNAZ BOROUMAND SMITH

Attorneys for Plaintiff
GOPRO, INC